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August 2, 2024

## VIA ECF

The Honorable Loretta A. Preska U.S. District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007

Re: Bainbridge Fund Ltd. v. The Republic of Argentina, No. 1:16-cv-08605-LAP

## Dear Judge Preska:

This firm represents the Republic of Argentina (the "Republic") in the above-captioned case. We write with consent of plaintiff Bainbridge Fund Ltd. ("Bainbridge") to provide a joint update regarding the status of discovery in this action as ordered by the Court on July 15, 2024. ECF 136.

The parties' positions concerning discovery remain as set forth in Bainbridge's letters of July 2, 2024 and July 11, 2024, ECFs 131, 135, and the Republic's letter of July 10, 2024, ECF 134. There have been no further updates on discovery since the time of these letters.

In the July 15, 2024 Order, the Court also asked that the parties update the Court as to whether the BCRA has produced any responsive documents relating to the reserve accounts. ECF 136. At the previous conference before this Court on March 18, 2024, the Court ordered that the Republic ask the BCRA to produce these documents, which the Republic did promptly on March 22. The BCRA declined to do so on April 10, and the Republic relayed the BCRA's response to

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Bainbridge. *See* ECF 104. Bainbridge then prepared and submitted on July 2, 2024 a Letter of Request to seek discovery of the BCRA through the Hague Convention on the Taking of Evidence, which the Republic agreed to the form and substance of. ECF 133.

Respectfully,

Carmine D. Boccuzzi

cc: All Counsel of Record (via ECF)